

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**JAMES EVERETT SHELTON**  
Plaintiff

-against-

Civil Action No. 2:18-cv-02070-NIQA

**TARGET ADVANCE, LLC**  
Defendants

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**DEFENDANT TARGET ADVANCE, LLC's NOTICE OF MOTION TO COMPEL THE  
PRODUCTION OF DISCOVERY**

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Counsel for Defendant, Target Advance, LLC, hereby moves this Court to Compel Plaintiff to respond fully and completely to Discovery Requests provided on September 20, 2019. Plaintiff is directed to respond in accordance with the Federal Rules of Civil Procedure.

Philadelphia, PA  
October 30, 2019

Respectfully submitted,  
**Law Office of Norman M. Valz, P.C.**



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Norman M. Valz, Esq.— Attorney for Movant  
Law Office of Norman M. Valz, P.C.  
PA I.D. No. 61338  
490 Norristown Road - Suite 151  
Blue Bell, PA 19422  
Tel. (215) 756-2424